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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. § 846)

JERMEL BROADHURST,
BETHZAIDA ANDUJAR, and
NAMEL LOVELACE,

Defendants.

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EASTERN DISTRICT OF NEW YORK, SS:

MATTHEW M. RAMARGE being duly sworn, deposes and states that he is a Special Agent with the Drug Enforcement Administration, duly appointed according to law and acting as such.

In or about and between January 18, 2016, and March 1, 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JERMEL BROADHURST, BETHZAIDA ANDUJAR and NAMEL LOVELACE did knowingly, intentionally and unlawfully conspire to distribute and possess with intent to distribute a substance containing heroin, a Schedule I controlled substance in violation of Title 21 United States Code, Section 841.

(Title 21, United States Code, Section 846)

The source of your deponent's information and the grounds for his belief are as follows:¹

¹ Because the purpose of this Complaint is to set forth only those facts necessary to

1. I am a Special Agent with the Drug Enforcement Administration ("DEA"), and have been involved in the investigation of numerous cases involving narcotics conspiracies. I am familiar with the facts and circumstances set forth below from my participation in the investigation, my review of the investigative file, and reports of other law enforcement officers involved in the investigation.

2. Between January 18, 2016 and January 30, 2016, the DEA received several phone calls from an anonymous confidential informant ("CI"). The CI advised law enforcement that a black male (subsequently identified as JERMEL BROADHURST) and a Hispanic female (subsequently identified as BETHZAIDA ANDUJAR) were distributing heroin, "molly," and marijuana in New York and Connecticut. The CI further stated that BROADHURST and ANDUJAR used the following vehicles, among others, to transport narcotics: a white Honda Accord bearing New York license plate HAZ2572 (the "White Honda Accord"); a silver BMW 650i bearing Pennsylvania license plate JWZ6688 (the "Silver BMW"); and a blue Nissan Maxima bearing New York license plate GST2314 (the "Blue Nissan Maxima"). A search of law enforcement databases indicated that the Blue Nissan Maxima and the White Nissan Murano were both registered to BETHZAIDA ANDUJAR.

3. The DEA received information from the CI that on February 1, 2016, JERMEL BROADHURST would pick up BETHZAIDA ANDUJAR at 210 Stuyvesant Avenue, Brooklyn, New York in the Silver BMW. The CI advised that BROADHURST would obtain heroin from his source of supply, pick up ANDUJAR, and then BROADHURST and ANDUJAR would go to 184 South 2nd Street, Brooklyn, New York to "bag up" the heroin.

establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

4. On February 1, 2016, at approximately 3:00 p.m., DEA agents established surveillance at 210 Stuyvesant Ave, Brooklyn, New York and 184 S. 2nd Street, Brooklyn, New York. At approximately 6:15 PM, law enforcement agents observed the Silver BMW pull up in front of 210 Stuyvesant Ave, Brooklyn, New York. At approximately 6:30 PM, agents observed a male (later identified as the defendant JERMEL BROADHURST) walk from the driver's side of the Silver BMW and get into the passenger's side of the Silver BMW. Moments later, the Silver BMW pulled into traffic driven by an unknown person (later identified as BETHZAIDA ANDUJAR). After driving for approximately 2 blocks, a coconspirator ("CC-1") entered the Silver BMW. At approximately 8:00 p.m., DEA agents stopped the Silver BMW and interviewed BROADHURST, ANDUJAR, and CC-1. A K-9 brought to the scene alerted to the presence of narcotics on the front passenger's floor area. A search of the Silver BMW was conducted with negative results. BROADHURST, ANDUJAR, and CC-1 were thereafter released.

5. Between February 2, 2016 and February 29, 2016, the DEA received additional phone calls from the CI. The CI stated that JERMEL BROADHURST had changed the license plate on the White Honda Accord to HDD3684. A search of law enforcement databases indicated that license plate HDD3684 was registered to JERMEL BROADHURST. The CI advised law enforcement that on February 29, 2016, JERMEL BROADHURST and BETHZAIDA ANDUJAR would leave from ANDUJAR's residence at 210 Stuyvesant Avenue, Brooklyn, New York, to drive heroin and marijuana to distribute in upstate New York. The CI further advised that ANDUJAR and BROADHURST would be driving either the White Honda or the Blue Nissan Maxima.

6. On February 29, 2016, at approximately 7:30 p.m., DEA agents established surveillance at 210 Stuyvesant Ave, Brooklyn, New York. Agents observed BROADHURST, ANDUJAR, and a third individual (later identified as NAMEL LOVELACE) exit the residence at 210 Stuyvesant Ave with multiple suitcases and enter the White Honda Accord which was parked in front of the residence. Law enforcement agents also observed a fourth individual (later identified as CC-1) enter the White Honda Accord.

7. At approximately 9:00 p.m., after DEA agents observed the White Honda Accord drive two miles towards the interstate highway, the DEA agents stopped the White Honda Accord. BROADHURST, ANDUJAR, LOVELACE, and CC-1 were removed from the White Honda Accord and searched. DEA agents recovered glassine envelopes containing a white powdery substance from the shoes of BROADHURST and ANDUJAR. When DEA agents attempted to search the shoes of NAMEL LOVELACE, LOVELACE became irate and began kicking at the agents. LOVELACE's shoe fell off during the struggle and glassine envelopes containing a white powdery substance fell to the ground. The powdery substance recovered from the shoes of JERMEL BROADHURST field-tested positive for the presence of heroin. In total, the gross weight of heroin recovered from the shoes of JERMEL BROADHURST, BETHZaida ANDUJAR and NAMEL LOVELACE was approximately 360 grams.

WHEREFORE, your deponent respectfully requests that the defendants JERMEL BROADHURST, BETHZAIDA ANDUJAR and NAMEL LOVELACE be dealt with according to law.



MATTHEW M. RAMARGE
Special Agent
Drug Enforcement Administration

Sworn to before me this
1 day of March, 2016

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EYES, JR.
JUDGE
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